

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

UNITED STATES OF AMERICA

vs.

KEITH EARL WYKLE

CR. NO. 8:22 cr 1011
18 U.S.C. § 641
18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)

INDICTMENT

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THE GRAND JURY CHARGES:

That from in or around July 2008, through the date of this Indictment, in the District of South Carolina, the Defendant, KEITH EARL WYKLE, knowingly and willfully did embezzle, steal, purloin and convert to his own use and the use of another funds in excess of \$1,000.00, which belonged to the Social Security Administration, a department or agency of the United States;

In violation of Title 18, United States Code, Section 641.

FORFEITURE

THEFT OF PUBLIC FUNDS:

Upon conviction for violation of Title 18, United States Code, Section 641 as charged in this Indictment, the Defendant, KEITH EARL WYKLE, shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offense.

PROPERTY:

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the property subject to forfeiture includes, but is not limited to, the following:

Forfeiture Judgment/Proceeds:

A sum of money equal to all proceeds the Defendant obtained directly or indirectly as the result of the offense charged in this Indictment, that is, a minimum of approximately \$78,773.59 in United States currency and all interest and proceeds traceable thereto, and/or that such sum equals all property derived from or traceable to his violation of 18 U.S.C. § 641.

SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the said Defendant up to the value of the above described forfeitable property.

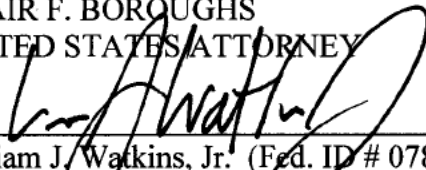
Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A True Bill



FOREPERSON

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

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